

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**DEBORAH BYGUM, Administratrix of
the Estate of ERIC MICHELL YOUNG,
deceased,**

Plaintiff,

v.

**Civil Action No. 2:19-CV-00456
Honorable John T. Copenhaver, Jr.**

**THE CITY OF MONTGOMERY, the
MONTGOMERY POLICE
DEPARTMENT, and ROGER L. KING,
individually as a member of the
Montgomery Police Department,**

Defendants.

**DEFENDANTS CITY OF MONTGOMERY, MONTGOMERY POLICE DEPARTMENT
AND ROGER KING'S RESPONSE TO PLAINTIFF'S MOTION TO AMEND**

COME NOW, Defendants City of Montgomery, Montgomery Police Department and Roger L. King, by counsel, Bailey & Wyant, PLLC, Charles R. Bailey and Michael W. Taylor, and hereby respond to Plaintiff's Motion to Amend as follows:

1. These Defendants have no objection to the amendment to the extent that it removes the Montgomery Police Department as a party, as stipulated, and removes certain claims against these Defendants, as stipulated.

2. As for the addition of two (2) additional parties, these Defendants assert no position or comment as it relates to amendment.

**ROGER KING, CITY OF MONTGOMERY
and CITY OF MONTGOMERY POLICE
DEPARTMENT,**

By Counsel,

/s/ Michael W. Taylor

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing “**DEFENDANTS CITY OF MONTGOMERY, MONTGOMERY POLICE DEPARTMENT AND ROGER KING’S RESPONSE TO PLAINTIFF’S MOTION TO AMEND**” was served upon the following parties through the Court’s Electronic Case Filing (ECF) system on this day, October 10, 2019:

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